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February 25, 2015

The Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street, Room 1640
New York, New York 10007

Re: Ralston Clarke v. Trans Union, LLC, et al
13-CV-02991 (CM)

Dear Hon. Judge McMahon:

I am the Counsel for Plaintiff in this case and I respectfully pray to this Honorable Court to accommodate my late service of Plaintiff's discoveries request.

The plaintiff was supposed to serve discovery documents on the Defendants by February 20, 2015. I inadvertently did not calendar the due date properly and I sincerely ask for the indulgence of the Court, to permit my late service that was made on February 25, 2015 and also to extend the response time for the Defendants.

Moreover, I was under the mistaken impression that the case with the Defendant, Verizon Wireless was among the cases settled. The Plaintiff is asking for discretionary extension of time to formally serve the Verizon Wireless within two weeks. Plaintiff with all humility is asking the Court for a discretionary extension of time to serve the Defendant, Verizon Wireless. In the absence of "good cause," the extension *may* still be granted in the exercise of discretion. *See Zapata v. City of New York*, 502 F.3d 192, 196 (2d Cir. 2007). We sincerely believe that good cause exists here as they were aware of this action and actually contacted me.

Thank you for the consideration of this matter.

Respectfully submitted:

/s/ Osita E. Okocha

Osita Emmanuel Okocha, Esq.

From: AB Universal <Mescenter@earthlink.net>

To: lawossy <lawossy@aol.com>

Subject: Answering Service Messages

Date: Mon, Jul 29, 2013 1:24 pm

Message For: OSITA OKOCHA

Taken 29-JUL-13 at 1:24PM by

CRG

|FROM:|

RENADA @ VERIZON WIRELESS

|COMPANY:| PATCH ATTEMPT NO

ANSWER, LEFT ON VM

|TEL:| 845 365-7693 |EXT:|

|RE:| RE: A COMPLAINT BY RALSTON CLARKE

VERIZON WIRELESS IS

ONLY 1 OF THE DEFENDANTS.

SHE IS TRYING TO GET MORE |CID| 8453657693

|ADDITIONAL INFORMATION| INFORMATION ON THE

COMPLAINT.